UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

TERRI PECHNER-JAMES and SONIA	
FERNANDEZ,	
Plaintiffs,	
v.)	C.A. No. 03-12499-MLW
CITY OF REVERE, THOMAS AMBROSINO,	
MAYOR, CITY OF REVERE POLICE	
DEPARTMENT, TERRENCE REARDON,	
CHIEF OF POLICE, BERNARD FOSTER,	
SALVATORE SANTORO, ROY COLANNINO,)	
FREDERICK ROLAND, THOMAS DOHERTY,)	
JOHN NELSON, JAMES RUSSO, MICHAEL)	
MURPHY and STEVEN FORD,	
Defendants,	

CITY DEFENDANTS' SUPPLEMENTAL BRIEF RE MOTION FOR SANCTIONS

NOW COME Defendants, City of Revere, City of Revere Police Department, Mayor Thomas Ambrosino and Police Chief Terence Reardon (City Defendants), and hereby submit this Supplemental Brief Re Motion for Sanctions: Fernandez (Docket Nos. 182-185); and, Pechner (Docket Nos. 188-191 & 194).

The Court's attention is respectfully directed to the recently decided case entitled *Santiago-Diaz v. Laboratorio Clinicio Y De Referencia Del Este*, Case No. 05-2543, 1st Circuit, August 8, 2006, a true and accurate copy of which is attached hereto as Exhibit "A."

[Signature on next page.]

For the Defendants By their Attorneys,

/s/ Walter H. Porr, Jr Paul Capizzi, Esq., City Solicitor BBO#: 646296 Walter H. Porr, Jr., Esq. Assistant City Solicitor BBO#: 659462 City Hall, 281 Broadway Revere, MA 02151 781-286-8166

Dated: August 15, 2006.

CERTIFICATE OF SERVICE

I, Walter H. Porr, Jr., Assistant City Solicitor and counsel of record for the Defendants, City of Revere, City of Revere Police Department, Mayor Thomas Ambrosino and Police Chief Terence Reardon, hereby certify that I have electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. I caused to be served upon counsel of record, at the address stated below, via the method indicated, a true copy of same:

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/s/ Walter H. Porr, Jr. Walter H. Porr, Jr.,

Dated: August 15, 2006